

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Feifei Gu

Plaintiff,

Case No.

v.

Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen,

Hui Chen, Qiubo Li, 252685 ST LLC, Yu Ying Wu,

Complaint

THE LLC D/B/A. Xiao Guo Group Inc, Athanasia DiMaggio,

Chat Mui Chan, Hugo Salazar, RE/MAX Real Estate Professionals,

Amy Lessinger, as President of RE/MAX, LLC, RE/MAX, LLC,

Erik Carlson, as CEO of RE/MAX Holdings,

JURY TRIAL

RE/MAX Holdings, ADA Vincent James Didonato III,

DEMANDED

ADA John Does (1-2), ADA Jane Doe, ADA Lawrence

Lusher, Eric Gonzalez, as Kings County District Attorney,

Nancy Hoppock, as Chief Assistant of Kings County District Attorney's Office,

Nicole Chavis, as Chief of Staff of Kings County District Attorney's Office,

Joseph P. Alexis, as Chief of Trials of Kings County District Attorney's Office,

Richard Boye, as Deputy Chief of Trials of Kings County District Attorney's

Office, Janet Gleeson, as Chief of Court Operations of Kings County District

Attorney's Office, David Z. Klestzick, as Deputy Chief of Trials of Kings County

District Attorney's Office, Patricia Mcneill, as Chief of Investigation of Kings

County District Attorney's Office, Fran Weiner, as Executive ADA Legal

Recruitment and Training of Kings County District Attorney's Office,

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Joseb Gim, as Chief of Criminal Court Unit, Kin W. Ng, as Bureau Chief,
the City of New York, Letitia James as Attorney General of State of NY,

Defendants

-----X
Plaintiff Feifei Gu sworn under penalty of perjury and alleges as follows:

I. PARTIES

1. Defendants Hang Chen (see Exhibit 1-2), Emily Hui Chen-Liang (see Exhibit 3),
Susana Chong Chen (see Exhibit 4), Hui Chen (see Exhibit 5) are agents of
RE/MAX Real Estate Professionals, and agents of 252685 ST LLC,

2. Defendants Athanasia DiMaggio (see Exhibit 6), Chat Mui Chan (see Exhibit 7),
Hugo Salazar (see Exhibit 8-9) are owners of RE/MAX Real Estate Professionals,
located at 8402 20th Ave, Brooklyn, NY 11214, 6423 11th Ave, Brooklyn, NY
11219, 261 4th Ave, Brooklyn, NY 11215, and 969 3rd Ave, Brooklyn, NY 11232,

3. Defendant Yu Ying Wu (see Exhibit 10-11) is the owner of THE LLC D/B/A
Xiao Guo Group Inc, and also the repair person who responded to police on
01/02/24,

4. Defendant Qiubo Li is member of 252685 ST LLC (see Exhibit 12), a resident
of Florida, who resides in 7387 Sika Deer Way, Fort Myers, FL 33966, and works
and owns China Wok located at 3285 Cleveland Ave, Fort Myers, FL 33901,

5. Defendants John Does (1-2) and Jane Doe are ADAs who appeared at Plaintiff's 05/16/24 Kings County Criminal Court Hearing,

6. Defendant Vincent James Didonato III (see Exhibit 13) is the ADA assigned to *The People of the State of NY v. Feifei Gu*, case # CR-001793-KN,

7. Defendant Lawrence Lusher (see Exhibit 14-15) is the screener of case # CR-001793-KN at Early Case Assessment Bureau at Kings County District Attorney's Office,

8. Plaintiff Feifei Gu is the Defendant in CR-001793-KN, and a resident at 2526 85st, 2F, Brooklyn, NY 11214,

9. The identity of the rest Defendants are reflected in the Caption,

II. JURISDICTION

1. Federal subject matter jurisdiction exists under 42 U.S.C.1983, this Court also has supplemental jurisdiction of this case as defined in 28 U.S.C.1367 (a) for state law causes of action,

2. Venue is proper in this district pursuant to 28 U.S. Code § 1391(d) as the City and NY Attorney General's Office is located in New York County.

III. NATURE OF THE ACTION

i. *The People of the State of NY v. Feifei Gu,*

case # CR-001793-KN

1. In 01/01/24 evening, Defendants Hang Chen, Susana Chong Chen, Emily Hui Chen-Liang reported to 911 that Plaintiff Feifei Gu destroyed the security camera placed over the door of 2F at 2526 85st, Brooklyn, NY 11214, police Joseph Robinson and police Daniel Siani came to the scene on 01/02/24 (see Exhibit 16-17 Body Camera Footage link),

2. Plaintiff was arrested on 01/12/24 8:40 PM at residence, then detained for 25 HOURS, suffered 25 HOURS of emotional turmoil, without sleeping for a single second, and was arraigned on 01/13/24 10 PM at Kings County Criminal Court,

3. Based on Superseding Information (see Exhibit 18), Defendant Vincent James Didonato III and Defendant Hang Chen stated the following:

1) December 31, 2023 at approximately 02:20 AM at 2526 85 street, Plaintiff Feifei Gu damaged security camera,

2) The informant Hang Chen observed via video surveillance that Plaintiff Feifei Gu using a stick to strike and damage one surveillance camera valued at \$450,

3) The informant Hang Chen is the custodian of the security camera,

4. Based on Complaint Room Screening Sheet (see Exhibit 14) by Defendant ADA Lawrence Lusher, it stated that Defendant Hang Chen owns the building and installed CCTV cameras.

5. On 05/16/24 Court Hearing, ADA John Does (1-2) and Jane Doe indicated the People would continue pursuing this case against Plaintiff Feifei Gu.

ii. Defendant Hang Chen, Emily Hui Chen-Liang, Susanan Chong Chen's
Fabrication of Criminal Case against Plaintiff Feifei Gu

**1. Defendant Hang Chen is not the custodian of
the alleged damaged camera**

1) From Body Camera footage of police Joseph Robinson (see Exhibit 16)
at 2:25 - 2:36, Defendant Emily Hui Chen-Liang stated:

"...we have another owner who also owns the house, only two owners, **and the
other owner in Florida, and he has access to the security camera...**"

2) From Body Camera footage of police Joseph Robinson (Exhibit 16)
at 12:38-12:50, Defendant Susana Chong Chen and police Joseph Robinson stated
the following:

police Joseph Robinson: So who owns the camera? It's the old owners or the new
owners, or you guys?

Susana Chen: The new owner, the owner that's away,

police Joseph Robinson: **So the new owner that's away, that's his camera?**

Susana Chen: **Yes**

police Joseph Robinson: **So he is not here, the owner,**

Susana Chen: **Yes**

3) Therefore, Defendant Hang Chen and ADA Vincent James Didonato III lied in
superseding information that Hang Chen is the **custodian** of the security camera.

2. Defendants Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen provided falsified evidence of the “damaged” camera

1) Referring to Exhibit 19 - evidence provided by above defendants, Defendants Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen circled **DO4** in the camera list captured at 2:12 to prove that the camera was damaged, which is the only evidence in support of the People’s allegation that Plaintiff damaged the security camera,

2) However, the camera alleged to be damaged is **CAM01** over the door of 2F, see Exhibit 20 (screenshot of videos provided by above Defendants), not **DO4**,

3) Besides,

- Exhibit 20, which was captured on 12/31/24 22:03:34, shows clear picture,

- From Body Camera footage of police Joseph Robinson (Exhibit 16) at 8:36-8:38

The indicator light is flashing as the normal working mode, not disconnected

- Thus above facts contradicted with above defendants and the People’s allegation that the camera was damaged by Plaintiff,

4) Neither Police Joseph Robinson nor Daniel Siani ever personally checked the camera.

5) Defendant Hang Chen and ADA Vincent James Didonato III thus LIED in

3. Defendant Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang

Chen, Yu Ying Wu, THE LLC D/B/A Xiao Guo Group Inc

Falsified the Payment Receipt of Camera

A. Defendants Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen

never paid for the new camera

1. From Body Camera footage of police Joseph Robinson (Exhibit 16),

at 9:58-10:10,

repairperson Yu Ying Wu stated,

“Can I go to basement?

I go to basement, the new camera,

Damaged the old camera, it's damaged”

2. From Body Camera footage of police Daniel Siani (Exhibit 17),

at 31:28-31:32,

Defendant Hang Chen stated to police Daniel Siani regarding the invoice:

“This is not including because he (repairperson Yu Ying Wu) didn't know the camera need to be fixed, every camera is 450,”

3. It can be concluded that Yu Ying Wu did not know the camera need to be fixed, so he did not bring any cameras with him, thus he went to basement of 2526 85 st to get the camera - it can be hereby inferred that the new camera was not brought by Yu Ying Wu, but owned by 252685 ST LLC,

4. Therefore, Defendants Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen, Yu Ying Wu, THE LLC D/B/A Xiao Guo group Inc falsified the Payment Receipt of camera.

B. The Three Receipts were all forged

1) There are even three DIFFERENT receipts presented by Defendants Qiubo Li, Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen, and Yu Ying Wu and THE LLC D/B/A Xiao Guo Group Inc:

Receipt 1 (see Exhibit 21) has no camera charge,

Receipt 2 (see Exhibit 22) has camera charge and wrote “paid 01/02/24” with a signature,

Receipt 3 (see Exhibit 23) has camera charge and wrote “Paid in Full Cash 01/02/24”

2) The invoice’s date is **01/01/24**, however, from body camera footage, police arrived on **01/02/24** and then Yu Ying Wu started “repair”,
- as such, receipt date even did not match - all three receipts were forged.

iii.

Campaign of Harassment Orchestrated by Qiubo Li, Hang Chen,

Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen, Yu Ying Wu

1

1. Referring to Exhibit 24, on 12/19/23, 252685 ST LLC bought the premise from Raymond Chan and Xin Mei Chen,

2. See Exhibit 25, Raymond Chan's sworn Affirmation in LT-001285-23/KI:

"On December 19, 2023, Respondent sold the subject premises to **Remax**"

2

3. On 12/20/24, Plaintiff sent text messages to Defendant Emily Hui Chen-Liang and Defendant Hang Chen regarding no heat and no hot water (see Exhibit 26), and wrote "so tomorrow if same issue you will come to check?"

4. However, on 12/21/24, having not come inside to check, Defendant Emily Hui Chen-Liang sent a message to Plaintiff, see Exhibit 27,

"As per landlord, if this is a **fraudulent complaint** again, we will add this cost to your bill",

5. Plaintiff found later that the person claimed by Defendant Emily Hui Chen-Liang to be a professional from the management team who came to check the boiler was NEVER A PROFESSIONAL but Defendant Yu Ying Wu - the same person who came to fix the security camera (see Exhibit 28),

6. On 12/26/23, HPD inspector issued **NO HOT WATER violation** after inspecting Plaintiff's 2F premise, and also noted Locked Boiler Room violation (see Exhibit 29),

7. See Exhibit 30, on 01/08/24, Defendants Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen **certified their correction to HPD.**

3

8. Also on 12/26/24, Defendant Qiubo Li signed the **Notice of Termination of tenancy** (see Exhibit 31),

9. Facts being Defendants Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen refused to sign a lease with Plaintiff,

4

10. On 12/29/24, a person came into the premises and tipped over Plaintiff's security camera (see Exhibit 32 video link), when asked, Defendant Hang Chen would not disclose the identity of the person (see Exhibit 33), neither did Emily Hui-Chen Liang nor Susana Chong Chen, Hui Chen disclose the identity of the person, Plaintiff reported Harassment to 911,

11. On 12/31/24, without any prior notice, Defendant Hang Chen took off the pic of the unidentified person who tipped over Plaintiff's security camera and only placed on Plaintiff's door a Notice to HPD, instead of on other tenants' door, while

being asked again who the person on 12/29/24 was, Defendant Hang Chen again refused to say anything and behaved in a rude manner (see Exhibit 34),

12. It was until 03/12/24 Plaintiff knew that Defendant Hang Chen did not allow Emily Hui-Chen Liang to say anything regarding the identity of the person on 12/29/24 (see Exhibit 35),

13. Later, from Exhibits that above defendants submitted in 505280/2024, Plaintiff found that on 12/29/23 it was Defendant Hui Chen who opened the door and let the unidentified person - Ted Somos inside the building (see Exhibit 36),

14. However, from Body Camera footage, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen misrepresented to the police that Plaintiff filed a harassment report of their attorney Ted Somos for no reasons and harassed them, LIARS!

5

15. On 02/08/24, Defendant Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen joined HP action (to obtain repairs) ON CONSENT through their attorney Mark Salems (see Exhibit 37),

16. Referring to Exhibit 38, there were **36 Violations issued by HPD**, Defendant Emily Hui Chen-Liang, Susana Chong Chen, Hang Chen thus misrepresented to police that Plaintiff filed false complaints to 311,

17. Defendants Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen were ordered by the Court to correct all violations starting 03/04/24 (see Exhibit 39),

18. On 03/04/24, Defendant Hang Chen referred Plaintiff as “Bullshit” when talking to Defendant Emily Hui Chen-Liang, and called the police when he could not even show his proof of ownership of the building, the police arrived, and did not allow him to come in (see Exhibit 40),

6

19. At all time, Defendant Hang Chen claimed to be owner of 252685 ST LLC, However, in case# 505280/2024, *252685 ST LLC, Hang Chen, Emily Hui Chen-Liang v. Feifei Gu, Yu Hin Chan*, see Exhibit 41, Defendant Hang Chen sworn under penalty of perjury on 01/31/24 that he is the **agent** of 252685 ST LLC (see Exhibit 41),

20. Defendant Hang Chen thus misrepresented to police that he is the owner of 252685 ST LLC,

7

21. In messages sent to Defendant Hang Chen, Plaintiff never wrote “I will go behind you,” as claimed by Defendant Hang Chen (see Exhibit 42),

22. Defendant Hang Chen thus lied to police that Plaintiff sent him such text message to get Order of Protection to kick Plaintiff out of the house,

8

23. In case# 505280/2024, *252685 ST LLC, Hang Chen, Emily Hui Chen-Liang v. Feifei Gu, Yu Hin Chan*, Defendant Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, stated,

“Upon information and belief, on or about December 31, 2023, Defendant filed Complaints Report No. 2023-62-8980 claiming aggravated harassment, see Exhibit 43,

24. However, the above mentioned police report was not filed by Plaintiff Feifei Gu but Defendant Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen as that day Plaintiff called the police but police refused to file harassment report against Hang Chen,

25. In Body Camera footage of police Joseph Robinson (Exhibit 16) at 4:35-4:46, Emily Hui Chen-Liang stated to police: “We already filed harassment report, we have that, with 911, and also the tenants gave us a letter that, I mean she has been harassing other tenants as well”

26. Also in body camera footage, Defendant Hang Chen stated he went to 62 Police Precinct to file a report on 12/31/24, thus the report was exactly the one

filed by Defendant Qiubo Li, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen.

27. However, Plaintiff never started any fight with any neighbors, not to even say harassment.

First Cause of Action

Conspiracy to Violate Plaintiff's Fourteenth and Fourth Amendment Right
against Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen, Qiubo Li, Hui
Chen, 252685 ST LLC, Yu Ying Wu, THE LLC D/B/A Xiao Guo group Inc,
ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2),
ADA Jane Doe

1. Title 42, section 1983 of the United States Code provides:

Every person who, under color of any state, ordinance, regulation, custom,
or usage, of any State or Territory or the District of Columbia, subjects, or causes
to be subjected, any citizen of the United States or other person within the
jurisdiction thereof to the deprivation of any rights, privileges, or immunities
secured by the Constitution and laws, shall be liable to the party injured in an
action at law, suit in equity, or other proper proceeding for redress,...

2. The Fourteenth Amendment provides that: "...no state...deprive any person of
life, liberty, or property, without due process of law.". The Fourth Amendment
protects people from unreasonable searches and seizures by the government. Such
rights are secured by the Constitution and laws in Title 42, section 1983,

3. ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe, while acting under color of state law, deprived Plaintiff Feifei Gu of above rights by failing to investigate and allows fabrication of evidence to go uncorrected by continuing with the prosecution towards Plaintiff Feifei Gu,

4. On 05/16/24 and 06/06/24, Plaintiff Feifei Gu sent Affirmation to dismiss two times to ADA Vincent James Didonato III alleging above-mentioned false evidence and also handed Affirmation to ADA John Doe at 05/16/24 Court Hearing, however, the People insists on prosecuting this FAKE CASE.

5. Private actors, such as Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen, Qiubo Li, Hui Chen, 252685 ST LLC, Yu Ying Wu, THE LLC D/B/A Xiao Guo Group Inc, are liable under section 1983 for conspiring with state officials ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe to violate Plaintiff's above rights by providing forged evidence and false testimony,

6. The Fourth Amendment's relevance to the deprivations of liberty go hand in hand with criminal prosecutions. See *Gerstein v. Pugh*, 420 U. S. 103, 114 (1975)

7. As of result of conspiracy between Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen, Qiubo Li, Hui Chen, 252685 ST LLC, Yu Ying Wu, THE LLC D/B/A Xiao Guo group Inc, and ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe, Plaintiff was wrongly arrested on 01/12/24, detained for 25 hours under emotional breakdown, and still lived under the pressure of the prosecution by the DA,

8. Plaintiff demands judgment of \$100 BILLION against each above defendant including compensatory and punitive damages.

SECOND CAUSE OF ACTION

42 U.S.C 1983 - Failure to Train, Failure to Supervise

against Eric Gonzalez, Nancy Hoppock, Nicole Chavis, Joseph P. Alexis, Richard Boye, Janet Gleeson, David Z. Klestzick, Patricia Mcneill, Fran Weiner, Joseb Gim, Kin W. Ng

1. Above Defendants, acting in concert and under color of state law, had a reasonable opportunity to prevent the violations of Plaintiff's federal constitutional and statutory rights as supervisors of Defendant ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe,

2. Under the doctrine of respondeat superior, above Defendants are answerable to Plaintiff's injuries for their failure to fulfill their constitutional and legal obligation to train and to supervise.

3. Plaintiff demands judgment of \$50 BILLION against each defendant.

Third Cause of Action

Failure to Supervise and Train

against Athanasia DiMaggio, Chat Mui Chan, Hugo Salazar,

RE/MAX Real Estate Professionals

1. Athanasia DiMaggio, Chat Mui Chan, Hugo Salazar, are owners of RE/MAX Real Estate Professionals, and are also the owners of the premise 2526 85st as alleged by prior owner Raymond Chan (see Exhibit 25), among them, Athanasia DiMaggio is a broker, Chat Mui Chan is a broker, Hugo Salazar is a broker and a disciplined lawyer (see Exhibit 44),

2. On 01/02/24, Plaintiff made a phone call to Defendant Chat Mui Chan (see Exhibit 45) and then sent text messages to Defendant Chat Mui Chan regarding Defendants Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen's harassment to Plaintiff including the 911 fake report, however, Defendant Chat Mui Chan refused to intervene,

3. Defendants Athanasia DiMaggio, Chat Mui Chan, Hugo Salazar, RE/MAX Real Estate Professionals are negligent in hiring and supervising,

4. Plaintiff demands \$50 Billion judgment each against Defendants Athanasia DiMaggio and Hugo Salazar, RE/MAX Real Estate Professionals, and \$100 Billion judgment against Chat Mui Chan.

Fourth Cause of Action

Negligent in Supervision, Failure to Train

Amy Lessinger, as President of RE/MAX, LLC, RE/MAX, LLC,

Erik Carlson, as CEO of RE/MAX Holdings, RE/MAX Holdings

1. Pursuant to doctrine of Respondeat Superior, Defendants Amy Lessinger, Erik Carlson, RE/MAX, LLC, RE/MAX Holdings are negligent in training and supervision of owners and employees of RE/MAX Real Estate Professionals - Athanasia DiMaggio, Chat Mui Chan, Hugo Salazar, Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen, Hui Chen,

2. Plaintiff demands \$50 Billion judgment against each above Defendant including compensatory damages and punitive damages.

Fifth Cause of Action

42 U.S.C. 1983 - Negligence against Letitia James as NY Attorney General

1. Below Defendants have violated NY False Claims Act:

1) Defendants Yu Ying Wu, THE LLC D/B/A Xiao Guo Group Inc, knowingly presented a false claim for payment of camera and forged three false versions of receipt,

2) Defendant Qiubo Li knowingly presented false records of “damaged” camera,

3) Defendants Yu Ying Wu, THE LLC D/B/A Xiao Guo Group Inc, Hang Chen, Emily Hui Chen-Liang, Susana Chong Chen, Hui Chen, Qiubo Li, 252685 ST LLC, knowingly made false statement material to a false claim,

2. Defendant Letitia James failed to investigate false claims despite the authority vested in her by the State of New York pursuant to New York False Claims Act,

3. Defendant Letitia James also failed to supervise Kings District Attorney Eric Gonzalez, leading to his failure to train and supervise his ADAs - Defendants ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe. As a result, those ADAs knowingly presented false case against Plaintiff Feifei Gu in Kings Criminal Court and insisted on further prosecution,

4. Plaintiff demands judgment of \$70 BILLION against Defendant Letitia James including compensatory and punitive damages.

SIXTH CAUSE OF ACTION

Monell under 42 U.S.C.1983 against City of New York

1. At all relevant time, Defendant the city of New York maintained a custom of failure to discipline ADAs who continue prosecuting fake cases even in fully aware of false and forged evidence,
2. Because of this custom, ADA Vincent James Didonato, ADA Lawrence Lusher, ADA John Does (1-2) and ADA Jane Doe, whom under the supervision of Joseb Gim, as Chief of Criminal Court Unit and Kin W. Ng, as Bureau Chief, and all under the supervision of Defendants Eric Gonzalez and Letitia James, are undeterred and insist on prosecuting the fake case against Plaintiff Feifei Gu, thus displaying severe indifference to Plaintiff's constitutional rights,
3. See Exhibit 46 - 90 DAY NOTICE,
4. The City is liable under Monell,
5. Plaintiff demands a judgment of \$100 Billion against Defendant the City of New York.

JURY DEMAND

Plaintiff Feifei Gu hereby demands a trial by jury on all issues.

Wherefore, Plaintiff Feifei Gu demands JUDGMENT against Defendants as follows:

1. An amount of \$100 Billion each against Defendant the City of New York, Defendant Chat Mui Chan,
2. An amount of \$100 Billion each against Defendants Emily Hui Chen-Liang, Hang Chen, Susana Chong Chen, Qiubo Li, Hui Chen, 252685 ST LLC, Yu Ying Wu, THE LLC D/B/A Xiao Guo group Inc,
3. An amount of \$100 Billion each against Defendants ADA Vincent James Didonato III, ADA Lawrence Lusher, ADA John Does (1-2), ADA Jane Doe,
4. An amount of \$70 BILLION against Defendant Letitia James,
5. An amount of \$50 BILLION each against Defendants Amy Lessinger, Erik Carlson, RE/MAX, LLC, RE/MAX Holdings,
6. An amount of \$50 Billion judgment against Defendant Athanasia DiMaggio, Hugo Salazar, RE/MAX Real Estate Professionals


7. An amount of \$50 Billion against Kings County District Attorney's Office
defendants - Eric Gonzalez, Nancy Hoppock, Nicole Chavis, Joseph P. Alexis,
Richard Boye, Janet Gleeson, David Z. Klestzick, Patricia Mcneill, Fran Weiner,
Joseb Gim, Kin W. Ng,

8. Professional discipline against Defendants Vincent James Didonato III,
Defendant Lawrence Lusher, Defendant ADA John Does (1-2), Defendant ADA
Jane Doe,

9. A finding of statutory violations against Defendants Qiubo Li, Emily Hui
Chen-Liang, Hang Chen, Susana Chong Chen, Hui Chen, Yu Ying Wu, 252685 ST
LLC, THE LLC D/B/A. Xiao Guo Group Inc.

10. Professional discipline against Emily Hui Chen-Liang, Hang Chen, Susana
Chong Chen, Hui Chen as real estate agents,

11. Such other and further relief as this Court deem just and proper.

Feifei Gu 

Sworn to before me on:

JUN 14 2024

State of New York
County of New York



DANIEL T. CHENG
Notary Public, State of New York
Reg. No. 04CH0015293
Qualified in New York County
Commission Expires Oct. 30, 2027

Exhibit /

Mark J. Abusaber
Commissioner of Motor Vehicles

NEW YORK STATE ^{USA}

DRIVER LICENSE

Class **D**

DOB [REDACTED]

**CHEN
HANG**

[REDACTED]

[REDACTED]

DOB [REDACTED]

Issued **02/10/2023**

Expires **06/16/2029**

HANG CHEN

[REDACTED]

E NONE

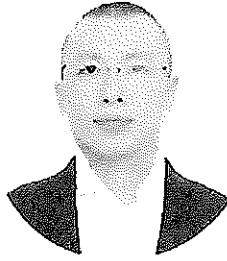
R NONE

Sex **M** Height **5'-06"** Eyes **BRO**

EXCELSIOR
PLATE NUMBER

NEW YORK

Exhibit 2



Tyler Chen

Licensed Real Estate Salesperson

Remax Real Estate Professionals

CONTACT AGENT

ABOUT

PAST DEALS

ACTIVE LISTINGS

Experience

View this agent's total verified deal history.

LANGUAGES

Cantonese and Mandarin

NY LICENSE NUMBER 10401288321

(Expires 10/17/2024)

NY LICENSED NAME chen hang

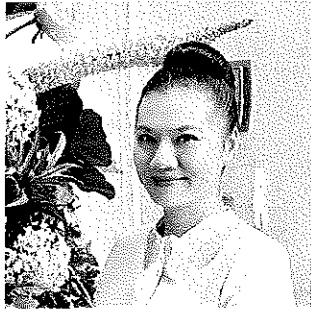
Exhibit 3

RE/MAX

Address, City, ZIP, and More



RE/MAX > Brooklyn > RE/MAX Real Estate Professionals > Chen Liang Hui



RE/MAX Real Estate Professionals

Chen Liang Hui

Lic. Real Estate Salesperson

Mobile: (347) 320-2569

Contact Me

View My Website

About

Awards

Office Address:

8402 20th Ave

Brooklyn, NY 11214-3004

Hobbies

Singing, Dancing

Experience

14 Years Experience

License #10401235357

Languages

English

Cantonese

Mandarin

Specialties

Condominiums

Condominiums

Multi-Family

Worldwide Property Search

RE/MAX Canada

RE/MAX Commercial

The RE/MAX Collection

Exhibit 4



ABOUT

PAST DEALS

ACTIVE LISTINGS

Susana C. Chen

Licensed Real Estate Salesperson

Remax Real Estate Professionals

EXPERIENCE

View this agent's total verified deal history.

CONTACT AGENT

2 past rentals

Languages Spanish and Mandarin

NY License Number 10401346011
(Expires 11/09/2024)

NY Licensed Name Chen Chong Susana

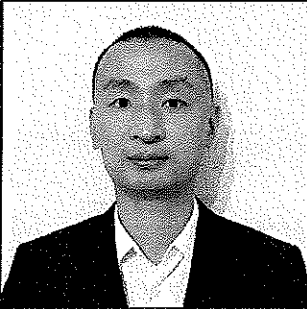
Exhibit 5



Address, City, ZIP, and More



RE/MAX > Brooklyn > RE/MAX Real Estate Professionals > Hui Chen



RE/MAX Real Estate Professionals

Hui Chen

Lic. Real Estate Salesperson

Mobile: (718) 775-5969

Contact Me

View My Website

About

Awards

Office Address:

8402 20th Ave

Brooklyn, NY 11214-3004

Experience

5 Years Experience

License #10401333718

Languages

English

Cantonese

Mandarin

Specialties

Multi-Family

Worldwide Property Search

RE/MAX Canada

RE/MAX Commercial

The RE/MAX Collection

Newest Listings

Exhibit 6

RE/MAX

Address, City, ZIP, and More



RE/MAX > Brooklyn > RE/MAX Real Estate Professionals > Athanasia (Sia) DiMaggio



RE/MAX Real Estate Professionals

Athanasia (Sia) DiMaggio

Licensed Real Estate Broker/Owner

Mobile: (646) 463-0896



Contact Me

View My Website

About

Awards

Listings

Office Address:

6423 11th Ave

Brooklyn, NY 11219-5621

About Me

Sia is a highly successful Real Estate Broker/Owner with more than two decades of sales experience in the industry. Certified Residential Specialist the highest awarded accredited designation. As an honest and hardworking professional, Sia is committed to surpassing her clients' expectations. She is known for her exceptional negotiation skills and unwavering integrity, ensuring that her clients receive the best deals possible. With expertise in both Residential & Commercial Sales, as well as Mixed Use

Read More

Exhibit 7



Address, City, ZIP, and More



RE/MAX > Brooklyn > RE/MAX Real Estate Professionals > Chat (Jackie) Chan



RE/MAX Real Estate Professionals

Chat (Jackie) Chan

Broker/Owner

Mobile: (917) 838-4152

Contact Me

View My Website

About

Awards

Listings

Office Address:

8402 20th Ave

Brooklyn, NY 11214-3004

About Me

Chat (Jackie) Chan is a New York State licensed Real Estate Broker practicing in the New York City metropolitan area with upwards of 25+ years of experience in both residential and commercial real estate. Fluent in Cantonese, Mandarin and English, Jackie is a local neighborhood expert specializing in the Brooklyn Chinese/ American market. A top producer and a steadfast seller's advocate. Since transitioning into her new role as Broker at RE/MAX, Jackie has created a tightly knit collaborative team

Read More

Service Areas

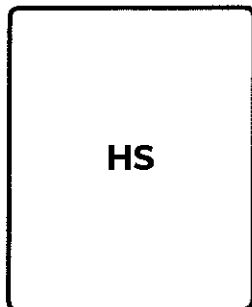
Exhibit *J*



Address, City, ZIP, and More



RE/MAX > Brooklyn > RE/MAX Real Estate Professionals > Hugo Salazar



RE/MAX Real Estate Professionals

Hugo Salazar

Licensed Real Estate Broker

Mobile: (917) 804-3713

Contact Me

View My Website

About

Awards

Listings

Office Address:

8402 20th Ave

Brooklyn, NY 11214-3004

About Me

STANDARDIZED OPERATING PROCEDURE FOR PURCHASERS OF REAL ESTATE
PURSUANT TO REAL PROPERTY LAW §442-H

Hugo Salazar (the "Broker") of RE/MAX Real Estate Professionals is making this
Standardized

Operating Procedure available on any publicly available website and mobile device
application.

Read More

Service Areas

Exhibit 9



remaxrealestatebrooklyn
Gino's Restaurant, Bay Ridge

...



Hugo Salazar



8 likes
remaxrealestatebrooklyn Great lunch celebrating our
owners birthday Happy birthday Hugo Salazar
September 23, 2023

Exhibit 10



Susana
chong chen

Yu Ying Wu

Exhibit //

Department of State Division of Corporations

Entity Information

[Return to Results](#)[Return to Search](#)

Entity Details

ENTITY NAME: XIAO GUO GROUP LLC	DOS ID: 5714680
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC LIMITED LIABILITY COMPANY	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 203 LLC - LIMITED LIABILITY COMPANY LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 02/24/2020	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 02/24/2020	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE
COUNTY: KINGS	NEXT STATEMENT DUE DATE: 02/28/2022
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

ENTITY DISPLAY

NAME HISTORY

FILING HISTORY

MERGER HISTORY

ASSUMED NAME HISTORY

Service of Process on the Secretary of State as Agent

The Post Office address to which the Secretary of State shall mail a copy of any process against the corporation served upon the Secretary of State by personal delivery:

Name: THE LLC

Address: 2235 W1ST ST, BROOKLYN, NY, UNITED STATES, 11223

Electronic Service of Process on the Secretary of State as agent: Not Permitted

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Exhibit 12

Property Owner Registration Information

Last Registration Date - 01/24/24 Registration Expiration Date - 09/01/24

+ Expand All

OWNER
Head Officer

ORGANIZATION

-

NAME
QIU BO LI

ADDRESS
729a 51 St, BROOKLYN, 11220

OWNER
Officer

ORGANIZATION

-

NAME
QIU BO LI

ADDRESS
729a 51 St, BROOKLYN, 11220

OWNER
Corporation

ORGANIZATION
252685 ST LLC

NAME
-

ADDRESS
729a 51 St, BROOKLYN, 11220

OWNER
Managing Agent

ORGANIZATION

-

NAME
SUSAN CHEN

ADDRESS
729a 51 St, BROOKLYN, 11220

Click here to find out more information about property registration and how to register if you are a property owner or agent

Exhibit 13

New York State Unified Court System

Attorney Detail Report - VINCENT JAMES DIDONATO III

Close

Attorney Detail Report - VINCENT JAMES DIDONATO III

Registration Number:	6079941
Name:	VINCENT JAMES DIDONATO III
Business Name:	BROOKLYN DISTRICT ATTORNEY'S OFFICE
Business Address:	350 JAY ST BROOKLYN, NY 11201-2904 (Kings County)
Business Phone:	(718) 250-3136
Email:	DIDONATOV@BROOKLYNDA.ORG
Date Admitted:	01/17/2024
Appellate Division Department of Admission:	2nd
Law School:	William & Mary Law School
Registration Status:	Attorney - Currently Registered
Next Registration:	Jul 2026

Disciplinary History

No record of public discipline

The Detail Report above contains information that has been provided by the attorney listed, with the exception of REGISTRATION STATUS, which is generated from the OCA database. Every effort is made to insure the information in the database is accurate and up-to-date.

The good standing of an attorney and/or any information regarding disciplinary actions must be confirmed with the appropriate Appellate Division Department. Information on how to contact the Appellate Divisions of the Supreme Court in New York is available at www.nycourts.gov/courts.



Attorney Services

[Close](#)

Exhibit 14



ERIC GONZALEZ
District Attorney

OFFICE OF THE DISTRICT ATTORNEY, KINGS COUNTY

RENAISSANCE PLAZA at 350 JAY STREET
BROOKLYN, N.Y. 11201-2908
(718) 250-2000

Complaint Room Screening Sheet

Screener: Lawrence Lusher
Screening date: 01/13/24
180.80 Date:
GJ Date:

Bureau: Trial Bureau 5 - Orange

Narcotics: ☒ N

GJ Time:

Defendants

Name - Last, First	Arrest Number	Sex	DOB	Age	AO	Complaint/DP	Class	
GU, FEIFEI	K24602365	F				1	Misdemeanor	NON Grand Jury

Gang member: ☐

TPOs

Date/Time	Place	PCT	Near School (if narcotics sale)
1 12/31/23 02:20 to:	2526 85 STREET	062	<input type="checkbox"/>

Arrests

Defendant	Date/Time	Place
GU, FEIFEI	01/12/24 20:42	2526 85 STREET

Circumstances:
Arrest Charges: PL 1450502

Complaint Charges

GU, FEIFEI	TPD 1	PL 145.00(1)

CRIM MIS // DEFT DAMAGED CCTV CAMERA

AT TPO DECEMBER 31, 2023

CW OWNS THE BUILDING, CW INSTALLED CCTV CAMERAS

DEFT IS A TENANT

DEFT HAS AN ISSUE WITH CCTV CAMERAS

CW VIEWS VIDEO OF DEFT DAMAGING CCTV CAMERAS

DEFT USED A STICK TO STRIKE THE CCTV CAMERAS DAMAGING THEM

CW CALLED 911, OFFICERS TOOK A REPORT ON JANUARY 2, 2023

CW PROVIDED VIDEO TO OFFICERS OF DEFT BREAKING CCTV CAMERA

CW STATES VALUE OF PROPERTY \$250 USC

ON JANUARY 12, ASSIGNED DETECTIVE CALLED DEFT FOR DEFT TO TURN HERSELF IN

DEFT LATER THAT DAY CALLS 911

AO ARRIVES, AO SPEAKS WITH DEFT

AO ARRESTS DEFT ON OPEN ICARD

BWC PROVIDED AND VIEWED IN ECAB

Statements

Defendant	Date/Time	Place	Statement Made To	Form of Stmt.
GU, FEIFEI	01/12/24 20:40	2526 95 Street	STEVEN VITELLI, shield, CMD:62	Oral

Circumstances:

After Miranda Rights ☐ Given By:

Substance of Statement:

DEFENDANT STATED IN SUM AND SUBSTANCE "I NEVER DAMAGED THE CAMERAS... I HAVE PROOF... I WAS AT HOME ON DECEMBER 31 AND JANUARY 1ST"

SEE BODY WORN CAMERA FOOTAGE

Interview

STEVEN VITELLI, shield (Arresting PO)

Interview: Telephone

If No Interview - Reason:

Body Camera Assigned:

Video Taken:

Comment:

Video Shared

Interview

MICHAEL SHER, shield 07435 (BWC Video Contributor)

Interview: No Interview

If No Interview - Reason:

Body Camera Assigned:

Video Taken:

Comment:

Video Shared

Exhibit 15

New York State Unified Court System

Attorney Online Services - Search

Close

Attorney Detail Report as of 06/05/2024

Registration Number:	6078778
Name:	LAWRENCE LUSHER
Business Name:	
Business Address:	Not on File
Business Phone:	
Email:	LAWRENCE.LUSHER@OUTLOOK.COM
Date Admitted:	01/11/2024
Appellate Division Department of Admission:	3rd
Law School:	Brooklyn Law School
Registration Status:	Attorney - Currently Registered
Next Registration:	Apr 2026

Disciplinary History

No record of public discipline

The Detail Report above contains information that has been provided by the attorney listed, with the exception of REGISTRATION STATUS, which is generated from the OCA database. Every effort is made to insure the information in the database is accurate and up-to-date.

The good standing of an attorney and/or any information regarding disciplinary actions must be confirmed with the appropriate Appellate Division Department. Information on how to contact the Appellate Divisions of the Supreme Court in New York is available at www.nycourts.gov/courts.



Attorney Services

Close

Exhibit 16

<https://youtu.be/eoM8GJGYKqs?si=udA0NaZKt6dFURtW>

<https://youtu.be/eoM8GJGYKqs?si=udA0NaZKt6dFURtW>

Exhibit 7

<https://youtu.be/dIzNJvMswXE?si=dSoNGTBhksn-hYZ->

Exhibit 18

CRIMINAL COURT OF THE CITY OF NEW YORK
PART APAR COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

V

FEIFEI GU

STATE OF NEW YORK
COUNTY OF KINGS

SUPERSEDING INFORMATION

DOCKET NO.
CR-001793-24KN

ASSISTANT DISTRICT ATTORNEY VINCENT DIDONATO SAYS THAT ON OR ABOUT DECEMBER 2023 AT APPROXIMATELY 02:20 AM AT 2526 85 STREET IN THE COUNTY OF KINGS, STATE OF NEW YORK,

THE DEFENDANT COMMITTED THE OFFENSE(S) OF:

PL 145.00(1) CRIMINAL MISCHIEF IN THE FOURTH DEGREE

IN THAT THE DEFENDANT DID:

HAVING NO RIGHT TO DO SO NOR ANY REASONABLE GROUND TO BELIEVE THAT THE DEFENDANT HAD SUCH RIGHT, INTENTIONALLY DAMAGE PROPERTY OF ANOTHER PERSON.

THE SOURCE OF DEPONENT'S INFORMATION AND THE GROUNDS FOR DEPONENT'S BELIEF ARE AS FOLLOWS:

THE DEPONENT IS INFORMED BY HANG CHEN THAT, AT THE APPROXIMATE ABOVE TIME AND PLACE, THE INFORMANT OBSERVED, VIA VIDEO SURVEILLANCE, THE DEFENDANT USING A STICK TO STRIKE AND DAMAGE ONE SURVEILLANCE CAMERA VALUED AT \$450 UNITED STATES CURRENCY.

THE DEPONENT IS FURTHER INFORMED BY THE INFORMANT THAT THE INFORMANT IS THE CUSTODIAN OF THE ABOVE-DESCRIBED PROPERTY AND THAT THE DEFENDANT DID NOT HAVE PERMISSION OR AUTHORITY TO DAMAGE THAT PROPERTY.

FALSE STATEMENTS MADE IN THIS DOCUMENT ARE
PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT
TO SECTION 210.45 OF THE PENAL LAW.

4/3/2024

DATE


SIGNATURE



Eric Gonzalez
District Attorney

DISTRICT ATTORNEY
KINGS COUNTY
350 JAY STREET
BROOKLYN, NY 11201-2908
(718) 250-2000
WWW.BROOKLYNDA.ORG

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS: AP2

THE PEOPLE OF THE STATE OF NEW YORK

SUPPORTING DEPOSITION

SUPERSEDING INFORMATION

Docket No.
CR-001793-24KN

-against-

FEIFEI GU,

STATE OF NEW YORK)
)
COUNTY OF KINGS)

I, HANG CHEN, have read the accusatory instrument filed in this action. The facts in that instrument stated to be on information furnished by me are true to my personal knowledge.

FALSE STATEMENTS MADE IN THIS
DOCUMENT ARE PUNISHABLE AS A CLASS
A MISDEMEANOR PURSUANT TO SECTION
210.45 OF THE PENAL LAW.

4/3/24

Date

Signature

Exhibit 19

2:12



Smart Device▼



2526 85th st



CAM01



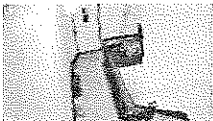
Online



CAM01



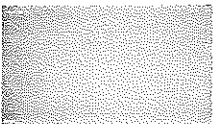
Online



CAM01



Online



D04



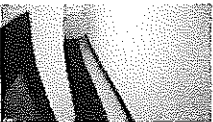
Unused



2526 85th st 2nd floor



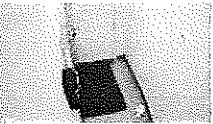
Online



CAM01



Online



CAM01



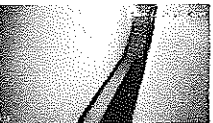
Online



CAM01



Online



D03



Online



CAM01



Online

Exhibit *Jo*



Exhibit 21

2025 03TH STREET BROOKLYN NY 11214

marks:

does not include camera replacement.
added an additional charge of \$450 per cam will apply.

Subtotal
Discount
Total Tax (11.75)
Other Fees
Total Balance

make check payable to : Xiaoguo Group Inc

ANK YOU!

Exhibit 22

XIAO GUO GROUP INC

SURVEILLANCE CAMERA SERVICE

2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070 2071 2072 2073 2074 2075 2076 2077 2078 2079 2080 2081 2082 2083 2084 2085 2086 2087 2088 2089 2090 2091 2092 2093 2094 2095 2096 2097 2098 2099 2100 2101 2102 2103 2104 2105 2106 2107 2108 2109 2110 2111 2112 2113 2114 2115 2116 2117 2118 2119 2120 2121 2122 2123 2124 2125 2126 2127 2128 2129 2130 2131 2132 2133 2134 2135 2136 2137 2138 2139 2140 2141 2142 2143 2144 2145 2146 2147 2148 2149 2150 2151 2152 2153 2154 2155 2156 2157 2158 2159 2160 2161 2162 2163 2164 2165 2166 2167 2168 2169 2170 2171 2172 2173 2174 2175 2176 2177 2178 2179 2180 2181 2182 2183 2184 2185 2186 2187 2188 2189 2190 2191 2192 2193 2194 2195 2196 2197 2198 2199 2200 2201 2202 2203 2204 2205 2206 2207 2208 2209 2210 2211 2212 2213 2214 2215 2216 2217 2218 2219 2220 2221 2222 2223 2224 2225 2226 2227 2228 2229 2230 2231 2232 2233 2234 2235 2236 2237 2238 2239 2240 2241 2242 2243 2244 2245 2246 2247 2248 2249 2250 2251 2252 2253 2254 2255 2256 2257 2258 2259 2260 2261 2262 2263 2264 2265 2266 2267 2268 2269 2270 2271 2272 2273 2274 2275 2276 2277 2278 2279 2280 2281 2282 2283 2284 2285 2286 2287 2288 2289 2290 2291 2292 2293 2294 2295 2296 2297 2298 2299 2300 2301 2302 2303 2304 2305 2306 2307 2308 2309 2310 2311 2312 2313 2314 2315 2316 2317 2318 2319 2320 2321 2322 2323 2324 2325 2326 2327 2328 2329 2330 2331 2332 2333 2334 2335 2336 2337 2338 2339 2340 2341 2342 2343 2344 2345 2346 2347 2348 2349 2350 2351 2352 2353 2354 2355 2356 2357 2358 2359 2360 2361 2362 2363 2364 2365 2366 2367 2368 2369 2370 2371 2372 2373 2374 2375 2376 2377 2378 2379 2380 2381 2382 2383 2384 2385 2386 2387 2388 2389 2390 2391 2392 2393 2394 2395 2396 2397 2398 2399 2400 2401 2402 2403 2404 2405 2406 2407 2408 2409 2410 2411 2412 2413 2414 2415 2416 2417 2418 2419 2420 2421 2422 2423 2424 2425 2426 2427 2428 2429 2430 2431 2432 2433 2434 2435 2436 2437 2438 2439 2440 2441 2442 2443 2444 2445 2446 2447 2448 2449 2450 2451 2452 2453 2454 2455 2456 2457 2458 2459 2460 2461 2462 2463 2464 2465 2466 2467 2468 2469 2470 2471 2472 2473 2474 2475 2476 2477 2478 2479 2480 2481 2482 2483 2484 2485 2486 2487 2488 2489 2490 2491 2492 2493 2494 2495 2496 2497 2498 2499 2500 2501 2502 2503 2504 2505 2506 2507 2508 2509 2510 2511 2512 2513 2514 2515 2516 2517 2518 2519 2520 2521 2522 2523 2524 2525 2526 2527 2528 2529 2530 2531 2532 2533 2534 2535 2536 2537 2538 2539 2540 2541 2542 2543 2544 2545 2546 2547 2548 2549 2550 2551 2552 2553 2554 2555 2556 2557 2558 2559 2560 2561 2562 2563 2564 2565 2566 2567 2568 2569 2570 2571 2572 2573 2574 2575 2576 2577 2578 2579 2580 2581 2582 2583 2584 2585 2586 2587 2588 2589 2590 2591 2592 2593 2594 2595 2596 2597 2598 2599 2600 2601 2602 2603 2604 2605 2606 2607 2608 2609 2610 2611 2612 2613 2614 2615 2616 2617 2618 2619 2620 2621 2622 2623 2624 2625 2626 2627 2628 2629 2630 2631 2632 2633 2634 2635 2636 2637 2638 2639 2640 2641 2642 2643 2644 2645 2646 2647 2648 2649 2650 2651 2652 2653 2654 2655 2656 2657 2658 2659 2660 2661 2662 2663 2664 2665 2666 2667 2668 2669 2670 2671 2672 2673 2674 2675 2676 2677 2678 2679 2680 2681 2682 2683 2684 2685 2686 2687 2688 2689 2690 2691 2692 2693 2694 2695 2696 2697 2698 2699 2700 2701 2702 2703 2704 2705 2706 2707 2708 2709 2710 2711 2712 2713 2714 2715 2716 2717 2718 2719 2720 2721 2722 2723 2724 2725 2726 2727 2728 2729 2730 2731 2732 2733 2734 2735 2736 2737 2738 2739 2740 2741 2742 2743 2744 2745 2746 2747 2748 2749 2750 2751 2752 2753 2754 2755 2756 2757 2758 2759 2760 2761 2762 2763 2764 2765 2766 2767 2768 2769 2770 2771 2772 2773 2774 2775 2776 2777 2778 2779 2780 2781 2782 2783 2784 2785 2786 2787 2788 2789 2790 2791 2792 2793 2794 2795 2796 2797 2798 2799 2800 2801 2802 2803 2804 2805 2806 2807 2808 2809 2810 2811 2812 2813 2814 2815 2816 2817 2818 2819 2820 2821 2822 2823 2824 2825 2826 2827 2828 2829 2830 2831

WYBEN: 6:44 AM - 6:45

1123

(1953) 10/10/53

1977/78: 200 000 000

DATE	DESCRIPTION	AMOUNT	BALANCE
1/1/81	URGENT REPAIR SERVICE FEE \$600 (X2)	1	\$1,200.00
	PROPERTY ADDRESS - 2526 85TH STREET BROOKLYN, NY 11214		
1/1/81	Updated camera replacement x1	1	\$450.00

Remarks:

* Price does not include camera replacement,
if needed an additional charge of \$450 per cam will apply.

Subtotal	\$1,650.00
Discount	\$0.00
Total Tax (8.75%)	144.37
Other Fees	\$0.00
Total Balance Due	1,794.37

Please make check payable to: Xingqun Group Inc.

THANKS

Exhibit 23

XIAOGUO GROUP INC**SURVEILLANCE CAMERA SERVICE**

(917) 514-8608

WY5553@GMAIL.COM

INVOICE

DATE: 01/01/2024

INVOICE NO. 009394

DESCRIPTION	QTY	AMOUNT
URGENT REPAIR SERVICE FEE \$600 (X2)	1	\$1,200.00
PROPERTY ADDRESS : 2526 85TH STREET BROOKLYN, NY 11214		
Updated : camera replacement x1	1	\$450,000
<i>Paid in Full</i>		
<i>Cash</i>		
<i>01/02/24</i>		

Remarks:

*Price does not include camera replacement,
 If needed an additional charge of \$450 per cam will apply.

Subtotal	\$1,650.00
Discount	\$0.00
Total Tax (8.75%)	144,37
Other Fees	\$0.00
Total Balance Due	1,794,37

Please make check payable to : Xiaoguo Group Inc

THANK YOU!

0


Exhibit 24

FILED: KINGS CIVIL COURT - L&T 01/02/2024 05:03 PM

INDEX NO. LT-001285-23/KI

NYSCEF DOC. NO. 8

RECEIVED NYSCEF: 01/02/2024

FOR CITY USE ONLY				REAL PROPERTY TRANSFER REPORT STATE OF NEW YORK STATE BOARD OF REAL PROPERTY SERVICES RP - 5217NYC											
C1. County Code _____ C2. Date Deed Recorded _____ Month _____ Day _____ Year _____		C3. Book _____ C4. Page _____ OR C5. CRFN _____													
PROPERTY INFORMATION															
1. Property Location <u>2526</u> <u>85TH STREET</u> <u>BROOKLYN</u> <u>11214</u> <small>STREET NUMBER STREET NAME BOROUGH ZIP CODE</small>															
2. Buyer Name <u>252685 ST LLC</u> <small>LAST NAME / COMPANY FIRST NAME</small>															
3. Tax Billing Address <u>252685 ST LLC</u> <small>LAST NAME / COMPANY FIRST NAME</small>															
4. Indicate the number of Assessment Roll parcels transferred on the deed <u>1</u> # of Parcels OR <input type="checkbox"/> Part of a Parcel		4A. Planning Board Approval - N/A for NYC 4B. Agricultural District Notice - N/A for NYC Check the boxes below as they apply: 6. Ownership Type is Condominium <input type="checkbox"/> 7. New Construction on Vacant Land <input type="checkbox"/>													
5. Deed Property Size <u>27</u> FRONT FEET X <u>100</u> DEPTH OR _____ ACRES		8. Seller Name <u>CHEN</u> <u>XIN MEI</u> <small>LAST NAME / COMPANY FIRST NAME</small>													
9. Check the box below which most accurately describes the use of the property at the time of sale: <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> A One Family Residential</td> <td style="width: 33%;"><input type="checkbox"/> C Residential Vacant Land</td> <td style="width: 33%;"><input type="checkbox"/> E Commercial</td> </tr> <tr> <td><input type="checkbox"/> B 2 or 3 Family Residential</td> <td><input type="checkbox"/> D Non-Residential Vacant Land</td> <td><input checked="" type="checkbox"/> F Apartment</td> </tr> </table>		<input type="checkbox"/> A One Family Residential	<input type="checkbox"/> C Residential Vacant Land	<input type="checkbox"/> E Commercial	<input type="checkbox"/> B 2 or 3 Family Residential	<input type="checkbox"/> D Non-Residential Vacant Land	<input checked="" type="checkbox"/> F Apartment	<table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> G Entertainment / Amusement</td> <td style="width: 33%;"><input type="checkbox"/> I Industrial</td> </tr> <tr> <td><input type="checkbox"/> H Community Service</td> <td><input type="checkbox"/> J Public Service</td> </tr> </table>				<input type="checkbox"/> G Entertainment / Amusement	<input type="checkbox"/> I Industrial	<input type="checkbox"/> H Community Service	<input type="checkbox"/> J Public Service
<input type="checkbox"/> A One Family Residential	<input type="checkbox"/> C Residential Vacant Land	<input type="checkbox"/> E Commercial													
<input type="checkbox"/> B 2 or 3 Family Residential	<input type="checkbox"/> D Non-Residential Vacant Land	<input checked="" type="checkbox"/> F Apartment													
<input type="checkbox"/> G Entertainment / Amusement	<input type="checkbox"/> I Industrial														
<input type="checkbox"/> H Community Service	<input type="checkbox"/> J Public Service														
SALE INFORMATION		14. Check one or more of these conditions as applicable to transfer:													
10. Sale Contract Date <u>11</u> / <u>16</u> / <u>2023</u> <small>Month Day Year</small>		<table style="width: 100%; border: none;"> <tr><td><input type="checkbox"/> A Sale Between Relatives or Former Relatives</td></tr> <tr><td><input type="checkbox"/> B Sale Between Related Companies or Partners in Business</td></tr> <tr><td><input type="checkbox"/> C One of the Buyers is also a Seller</td></tr> <tr><td><input type="checkbox"/> D Buyer or Seller is Government Agency or Lending Institution</td></tr> <tr><td><input type="checkbox"/> E Deed Type not Warranty or Bargain and Sale (Specify Below)</td></tr> <tr><td><input type="checkbox"/> F Sale of Fractional or Less than Fee Interest (Specify Below)</td></tr> <tr><td><input type="checkbox"/> G Significant Change in Property Between Taxable Status and Sale Dates</td></tr> <tr><td><input type="checkbox"/> H Sale of Business is Included in Sale Price</td></tr> <tr><td><input type="checkbox"/> I Other Unusual Factors Affecting Sale Price (Specify Below)</td></tr> <tr><td><input checked="" type="checkbox"/> J None</td></tr> </table>				<input type="checkbox"/> A Sale Between Relatives or Former Relatives	<input type="checkbox"/> B Sale Between Related Companies or Partners in Business	<input type="checkbox"/> C One of the Buyers is also a Seller	<input type="checkbox"/> D Buyer or Seller is Government Agency or Lending Institution	<input type="checkbox"/> E Deed Type not Warranty or Bargain and Sale (Specify Below)	<input type="checkbox"/> F Sale of Fractional or Less than Fee Interest (Specify Below)	<input type="checkbox"/> G Significant Change in Property Between Taxable Status and Sale Dates	<input type="checkbox"/> H Sale of Business is Included in Sale Price	<input type="checkbox"/> I Other Unusual Factors Affecting Sale Price (Specify Below)	<input checked="" type="checkbox"/> J None
<input type="checkbox"/> A Sale Between Relatives or Former Relatives															
<input type="checkbox"/> B Sale Between Related Companies or Partners in Business															
<input type="checkbox"/> C One of the Buyers is also a Seller															
<input type="checkbox"/> D Buyer or Seller is Government Agency or Lending Institution															
<input type="checkbox"/> E Deed Type not Warranty or Bargain and Sale (Specify Below)															
<input type="checkbox"/> F Sale of Fractional or Less than Fee Interest (Specify Below)															
<input type="checkbox"/> G Significant Change in Property Between Taxable Status and Sale Dates															
<input type="checkbox"/> H Sale of Business is Included in Sale Price															
<input type="checkbox"/> I Other Unusual Factors Affecting Sale Price (Specify Below)															
<input checked="" type="checkbox"/> J None															
11. Date of Sale / Transfer <u>12</u> / <u>19</u> / <u>2023</u> <small>Month Day Year</small>		15. Building Class <u>C, 3</u> 16. Total Assessed Value (of all parcels in transfer) <u>9,876,4</u>													
12. Full Sale Price \$ <u>1,200,000</u> <small>(Full Sale Price is the total amount paid for the property including personal property. This payment may be in the form of cash, other property or goods, or the assumption of mortgages or other obligations.) Please round to the nearest whole dollar amount.</small>		17. Borough, Block and Lot / Roll Identifier(s) (If more than three, attach sheet with additional identifier(s)) <u>BROOKLYN 6860 16</u>													
13. Indicate the value of personal property included in the sale _____															

202312180008220101

Exhibit 25

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS: HOUSING PART B

----- X Index No.: LT-001285-23/KI

FEIFI GU,

Plaintiff,

- against -

RAYMOND CHAN and DEPARTMENT OF HOUSING
PRESERVATION AND DEVELOPMENT,

Defendant,

----- X

STATE OF NEW YORK

}

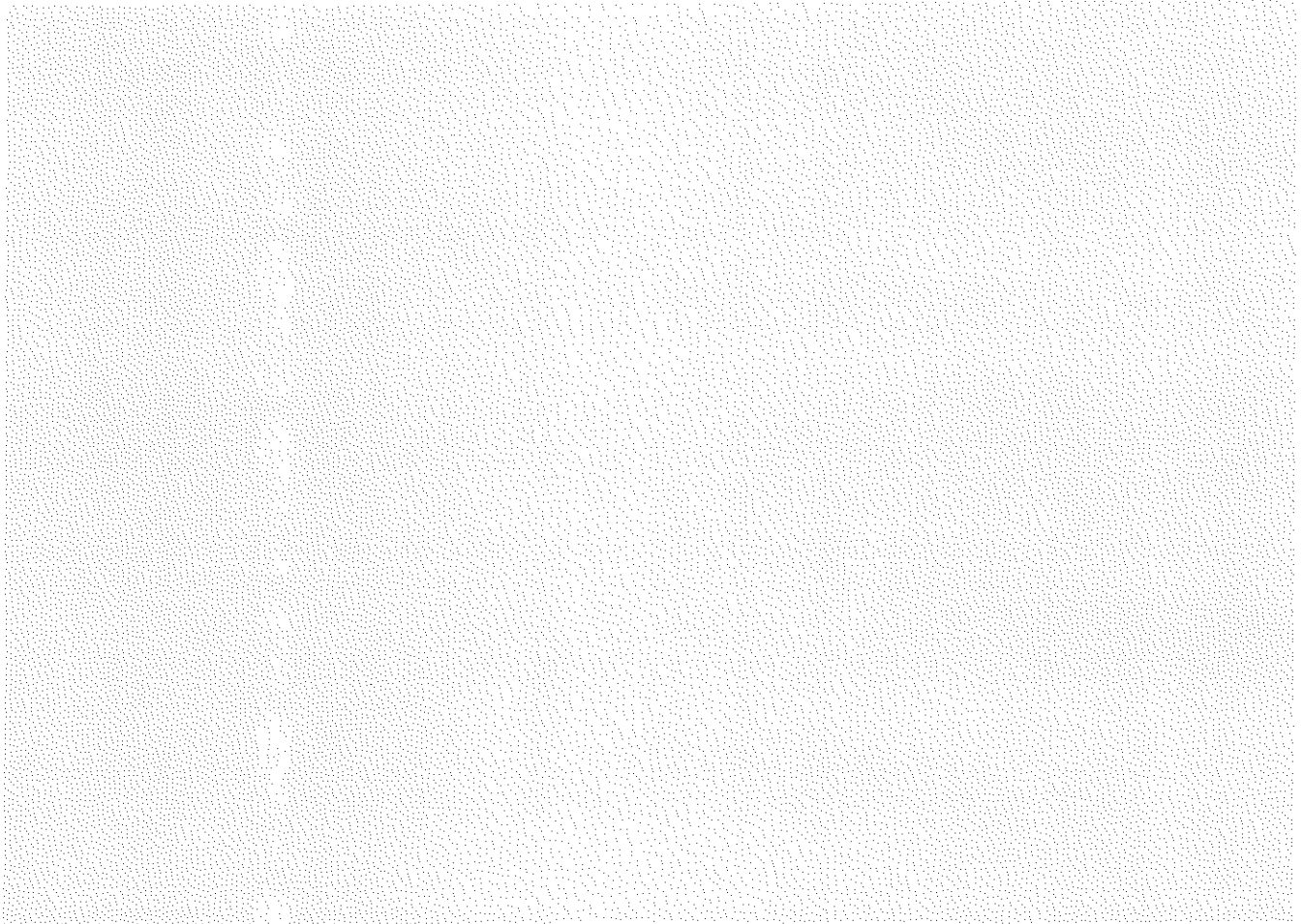
}ss:

COUNTY OF KINGS

}

AFFIDAVIT IN
OPPOSITION AND IN
SUPPORT

I, Raymond Chan, am over 18 years of age, being duly sworn, deposes and says under the penalties of perjury:



4. On December 19, 2023, Respondent sold the subject premises to Remax (Exhibit C).

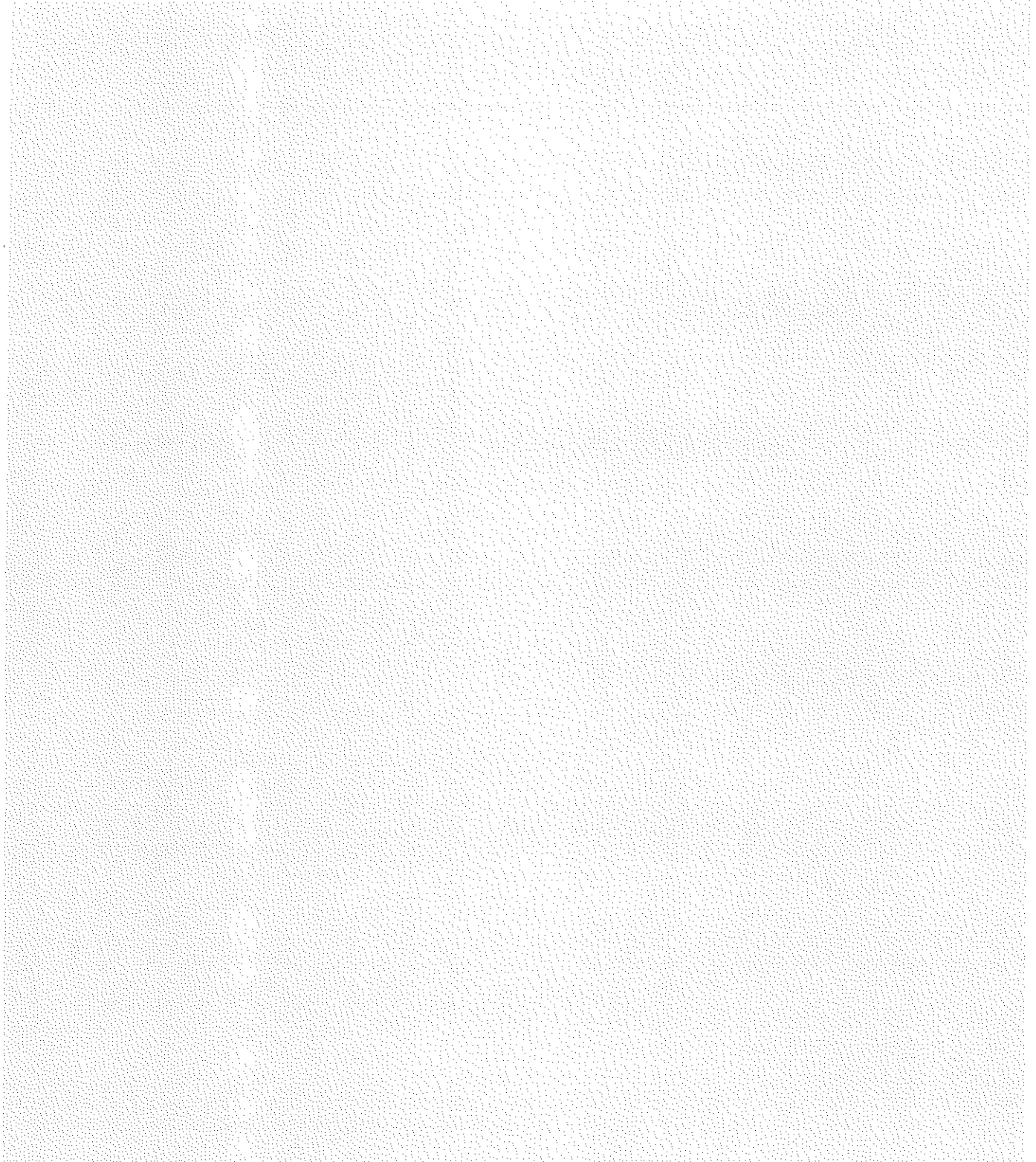


Exhibit 26

Wed, Dec 20 at 6:23 PM

The heat and hot water is the most urgent problem now

Are you going to change the boiler?
Totally cold shower water now

And no heat

Still haven't received pic of your deed

Emily Liang (347) 320-2569

Hi Ms. Gu, When can we have an access to check it out for the urgent matter to you? I just spoke with other units, they said they have no problem with hot water and heat.

Oh really? I talked to one neighbor and she said the same problem in her apt

So tomorrow if same issue you will come to check ?

Hang Chen (646) 239-5999

Read carefully what Emily says

Exhibit 27

Thu, Dec 21 at 5:15 PM

I would have expert witness come to examine the heat and hot water, pls let us know time that you would allow access to basement.

If you give no response, we will address this issue at court.

Emily Liang (347) 320-2569

Hi Ms.Gu and Mr.chan, as our previous conversation, all other tenants DO NOT have any heat or hot water issue. So There's no need to access to the basement. Can we have your permission to access your apartment to check and address the issue? Plus Everything will be documented.

As per landlord, if this is a fraudulent complaint again, we will add this cost to your bill.

Your refusal is documented here. We will address this issue to judge.

Exhibit 28

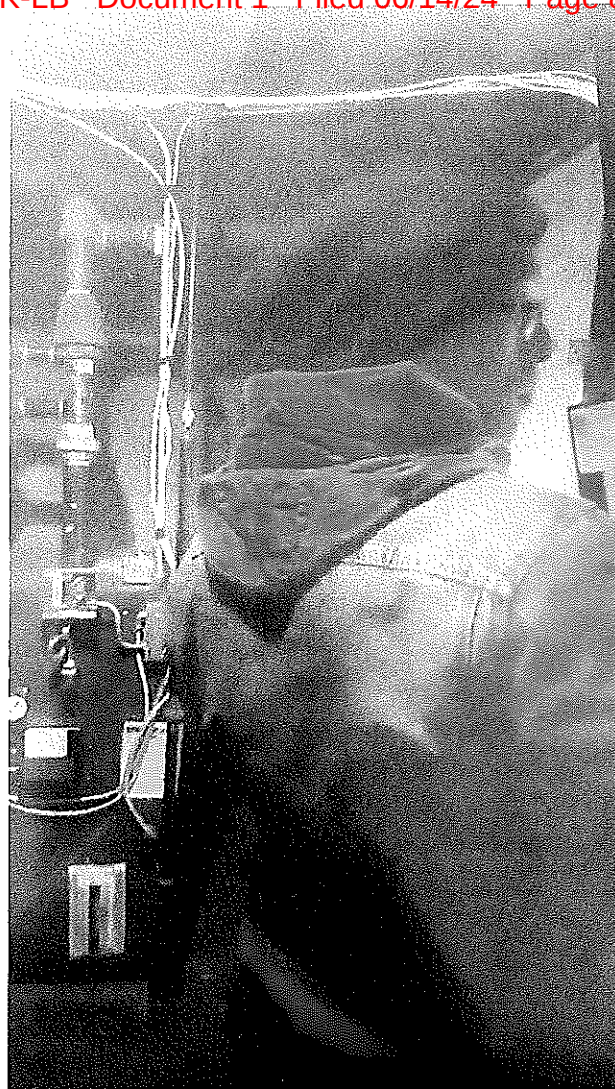


Exhibit 29

Exhibit 30

RHM FORM CIV-14-HEAT

(REV. 11/22)



Department of
Housing Preservation
& Development
nyc.gov/hpd

DCE/ BROOKLYN BORO OFFICE
701 Euclid Avenue
BROOKLYN, NY 11208

THE CITY OF NEW YORK
DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT
DIVISION OF CODE ENFORCEMENT

BLDG ID	BORO	REG NO	HOUSE NO.	STREET NAME	NOV ID	PAGE
179840	BK	340106	2526	85 STREET	8864142	1 of 1

NOTICE OF RECEIPT OF VIOLATION CERTIFICATION

NAME AND ADDRESS
GU FEIFEI Apt. 2F 2526 85 STREET BROOKLYN, NY 11214

This is to notify you that the landlord of the above referenced building claims to have corrected the violations listed on this form. If we do not hear from you, we may or may not attempt to reinspect this condition. If we do not reinspect this condition, the violation(s) will be closed based on the information from the owner 70 days after the date in the column labelled "Certified by Owner."

IF ANY VIOLATION HAS NOT BEEN CORRECTED AND YOU WANT TO FILE A TENANT CHALLENGE TO THIS CERTIFICATION, EITHER,

- . Call the Code Enforcement Boro Office at 212 863-7250 or email us at BKtenantchallenge@hpd.nyc.gov OR
- . Complete this form as follows:

- . Circle the numbers of the violations you claim are uncorrected on the AGENCY COPY;
- . Sign the claim of uncorrected violations at the bottom of the AGENCY COPY;
- . Keep the OCCUPANT COPY of this notice or make a copy of the AGENCY COPY for your records; and
- . Return the AGENCY COPY of this form within 5 days to the appropriate borough office at the address provided above

Note: You will receive a notice if an inspection by this department confirms that the violation(s) have not been corrected.

VIOLATION NUMBER	ISSUE DATE	CLASS	VIOLATION DESCRIPTION	CORRECT BY	CORRECTION BY OWNER	CERTIFY BY OWNER
16547500	12/26/2023	C	§ 27-2031 ADM CODE PROVIDE HOT WATER AT ALL HOT WATER FIXTURES IN THE ENTIRE APARTMENT LOCATED AT APT 2F, 2nd STORY, 1st APARTMENT FROM WEST AT NORTH	12/27/2023	01/05/2024	01/08/2024

You can go on-line to www.nyc.gov/hpd for more information about pending violations on this property, violation class and corrected by / certify regulations.

CLAIM OF UNCORRECTED VIOLATIONS

I HAVE CIRCLED THE VIOLATION NUMBERS THAT HAVE NOT BEEN CORRECTED.

OCCUPANT'S SIGNATURE

DATE SIGNED

CONTACT PHONE #

Exhibit 31

NOTICE OF TERMINATION

Date: December 26, 2023
To: Fei Fei Gu
Yuhin Chan
Premises: 2526 85th Street
Brooklyn, New York 11214
Apartment 2F

PLEASE TAKE NOTICE that the undersigned Landlord hereby elects to terminate your tenancy of the above described premises.

PLEASE TAKE FURTHER NOTICE that unless you remove from the said premises on or before March 31, 2024, the date upon which your term will expire, the undersigned will commence summary proceedings against you under Article 7 of the Real Property Actions and Proceedings Law, to remove you from the above described premises for the holding over after the expiration of your term, and will demand the value of your use and occupancy of the said premises during such holding over.

LANDLORD:
252685 ST LLC


By: Qibo Li, Member

Exhibit 32

<https://youtu.be/k67qykPL6FU?si=6wLuSbHtJAD1Bufs>

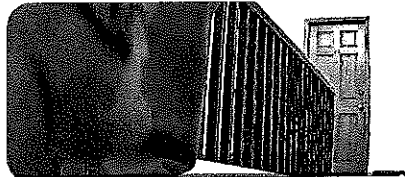
Exhibit 33

Fri, Dec 29 at 7:52 PM



WHO IS HE? HE DAMAGED MY
BELONGINGS I HAVE CALLED 911

YOU EITHER EXPLAIN THIS OR THE
POLICE WILL CALL YOU



TAKE HIS DIRTY FEET FROM MY
THING, IF YOU DON'T TEACH HIM, I
WILL TEACH HIM

AND HIS BMW 4 SERIES IN BLUE
COLOR, I HAVE THE PLATE NUMBER

Hang Chen (646) 239-5933



What bmw 4 series?

SO YOU KNOW HIM

Hang Chen (646) 239-5933



Show me the car with plate number
you mentioned

SO YOU KNOW HIM

Hang Chen (646) 239-5939

Show me the car with plate number
you mentioned

I GOT IT YOU KNOW HIM

Hang Chen (646) 239-5939

I saw you mentioned a car with the
plate

I AM ASKING YOU THE PERSON
NOT THE CAR! YOU WORK AT
DMV??

Hang Chen (646) 239-5939

What is your belongings got
damaged?

I AM ASKING YOU THE PERSON
YOU KNOW HIM OR NOT?!

Hang Chen (646) 239-5939

Again , what is your belongings got
damaged?

AGAIN, YOU KNOW HIM OR NOT?! I
AM NOT PLAYING GAMES WITH
YOU

Hang Chen (646) 239-5939

You are

You are claiming "guy with bmw"
damaged your belongings. You don't
want to show me what BMW

AGAIN, YOU KNOW HIM OR NOT?! I
AM NOT PLAYING GAMES WITH
YOU

Hang Chen (646) 239-5999

HC

You are

You are claiming "guy with bmw"
damaged your belongings. You don't
want to show me what BMW,
You don't want to show me what
belongings got damaged. Are you a
scammer?

HC

Exhibit 34

<https://youtube.com/shorts/fHCNZoCEOXw?si=27j-I3wLtSGCc8VA>

Transcript

Defendant Hang Chen: Don't put this picture on the wall,

Plaintiff Feifei Gu: Any reason I can't do that?

Defendant Hang Chen: This is public area,

Plaintiff Feifei Gu: So who's that person in the pic?

Defendant Hang Chen: As you are recording me, I am also going to record you,

Plaintiff Feifei Gu: No problem,

Defendant Hang Chen: so you saw the notice put on your door,

Plaintiff Feifei Gu: Tell me who is that person on the pic,

Defendant Hang Chen: OK, I put the notice on your door and you saw that,

---The picture Plaintiff referred to was Exhibit 36 of Ted Somos-----

Exhibit 35

<https://youtu.be/IEH6wvi0kRU?si=kJRqSkLzUpOMZp13>

Transcript

Plaintiff Feifei Gu: That person behaved really strange, I don't know what he was doing here, knocking on my door when I was taking shower,

Defendant Emily Hui Chen-Liang: He is a process server,

Plaintiff Feifei Gu: Then why no one responded that he is a process server when I asked his identity in the group message? You were also in the group,

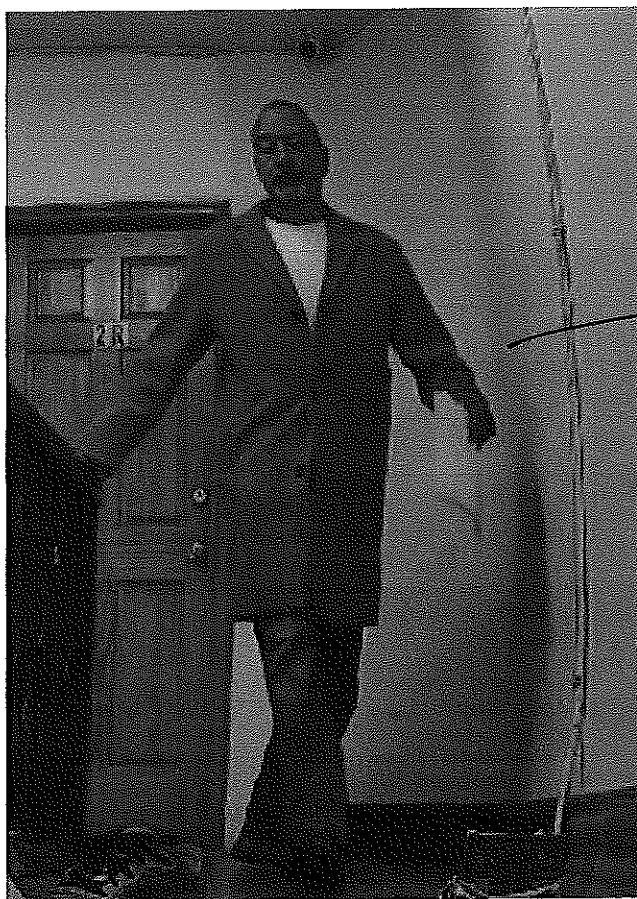
Plaintiff Feifei Gu: I asked if you (Defendant Emily Hui Chen-Liang) or him (Defendant Hang Chen) knew that person in the group message, as he tipped over my security camera, he (Defendant Hang Chen) responded in text as if he did not know that person, he (Defendant Hang Chen) could just tell me that person is a process server,

Defendant Emily Hui Chen-Liang: Yes, he could just say it, told you that, but he didn't,

Plaintiff Feifei Gu: But you were also in the group, you received that message as well, you never said anything,

Defendant Emily Hui Chen-Liang: I wasn't allowed to say anything then,....

Exhibit 36



→ Ted Somos



→ Ted Somes

✓ Hui Chen

Exhibit 37



Shelbi Ferrari <fg1011@nyu.edu>

NYSCEF Alert: Kings - Landlord and Tenant - HP Action (to obtain repairs) - LT-001285-23/KI (Feifi Gu v. Raymond Chan et al.)

1 message

efile@nycourts.gov <efile@nycourts.gov>

Thu, Feb 8, 2024 at 3:00 PM

To: msalem@marksalemlaw.com, fg1011@nyu.edu, Wilsonju@hpd.nyc.gov



**Kings County Civil Court - Landlord and Tenant Division
Comment Added to Case
02/08/2024**

Comment from Court User - Mitchell Cohen

Pet's OSC to join additional Respondent granted on consent. Resp OSC marked fully submitted and Decision Reserved.

Case Information

Index #: LT-001285-23/KI

Caption: Feifi Gu v. Raymond Chan et al.

Assigned Case Judge:

E-mail Notifications Sent

Name	Email Address
Mark Salem	msalem@marksalemlaw.com
JULIA WILSON	Wilsonju@hpd.nyc.gov
Feifi Gu	fg1011@nyu.edu

NOTICE: This e-mail is intended only for the named recipient and for the purposes of the New York State Courts E-Filing System. If you are neither the intended recipient nor a person designated to receive messages on behalf of the intended recipient, notify the sender immediately.

If you are unsure of the contents or origin of this email, it is advised to NOT click on any links provided. Instead, log into your NYSCEF account to access the documents referred to in this email. Thank you.

Exhibit 38

FILED: KINGS CIVIL COURT - L&T 01/03/2024 11:31 PM

NYSCEF DOC. NO. 26

INDEX NO. LT-001285-23/KI

RECEIVED NYSCEF: 01/03/2024

NYC

HPD Online

fg1011@nyu.edu

Logout

English

▼

Help

2526 85 Street, Brooklyn, 11214

Q

Overview

▼

Complaints

Last 2 years

Open Complaints - 0

61

Violations

A Class - 9

B Class - 16

C Class - 11

I Class - 0

36

Building Charges/Fees

Work Orders - 0

Total Fees - 11

11

Exhibit 39

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS: PART B

-----X
FEI FEI GU,

Petitioner,

-against-

252685 ST. LLC, SUSAN CHEN and NEW YORK CITY
DEPARTMENT OF HOUSING PRESERVATION AND
DEVELOPMENT,

Respondents.
-----X

Hon. Remy Smith

Recitation pursuant to CPLR §2219 of the papers considered on these motions ##1 & 2:

Petitioner's Motion to Substitute	1
Respondent's Opposition	2
Respondent's Notice of Motion and supporting papers	3
Petitioner's Opposition	4
Respondent's Reply Affirmation	5

Petitioner's motion to substitute new owner and managing agent is granted and the proceeding is dismissed against the old owner Raymond Chen and the caption is amended as set forth above.

The court

notes that there are 30 open violations in this 4 unit building spread across common area and petitioner's apartment only.

the petitioner grant access to the landlord to correct the HPD violations on the following dates, which will provide both parties with ample time to make arrangements to facilitate compliance: March 4, 5 and 6, 2024 from 9:00 a.m. - 5:00 p.m. each day, with workers to arrive no longer than 11:00 a.m. each day. The court orders additional access 2 weeks later on March 12 and 13, 2024, 9:00 a.m. to 5:00 p.m., workers to arrive by 11:00 a.m. each day. Parties shall return to court to address petitioner's request for an Order to Correct and respondent's request for additional access or related relief on March 19, 2024 at 9:30 a.m.

All parties shall return to court on March 19, 2024 at 9:30 a.m.

The foregoing is the Decision/Order of this court.

Dated: Brooklyn, New York
February 14, 2024


BY: 
Remy Smith, J.H.C.

Exhibit 40

<https://youtu.be/leRPJEVqS9c?si=kQB0s5unvsLnXzuR>

Exhibit 41

FILED: KINGS COUNTY CLERK 02/22/2024 10:22 AM

NYSCEF DOC. NO. 1

INDEX NO. 505280/2024

RECEIVED NYSCEF: 02/22/2024

VERIFICATION

HANG CHEN affirms the following subject to the penalties perjury pursuant to CPLR 2106:

I am an agent of 252685 ST LLC, a plaintiff herein, ("Plaintiff") and am familiar with the facts of this case based upon my review of Plaintiffs corporate books and records. I hereby state that the facts and allegations contained in the Complaint are true, except so far as they are therein stated to be on information and that, so far as they are therein stated to be on information, I believe them to be true.

I affirm this 31 day of January, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I do stand that this document may be filed in an action or proceeding in a court of law.

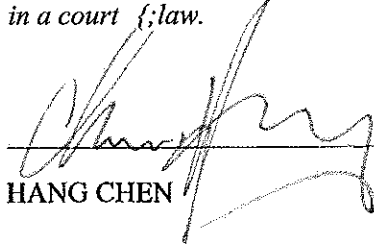

HANG CHEN

Exhibit 42

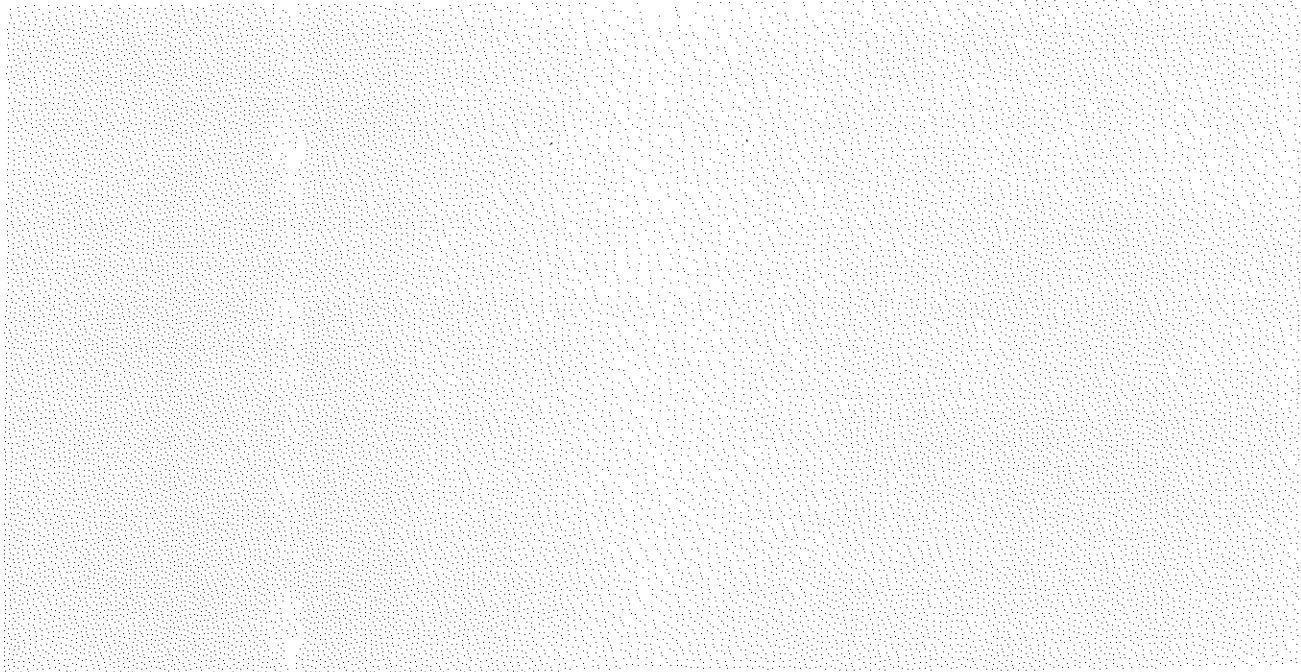
Records Snapshot

Total Records: 100

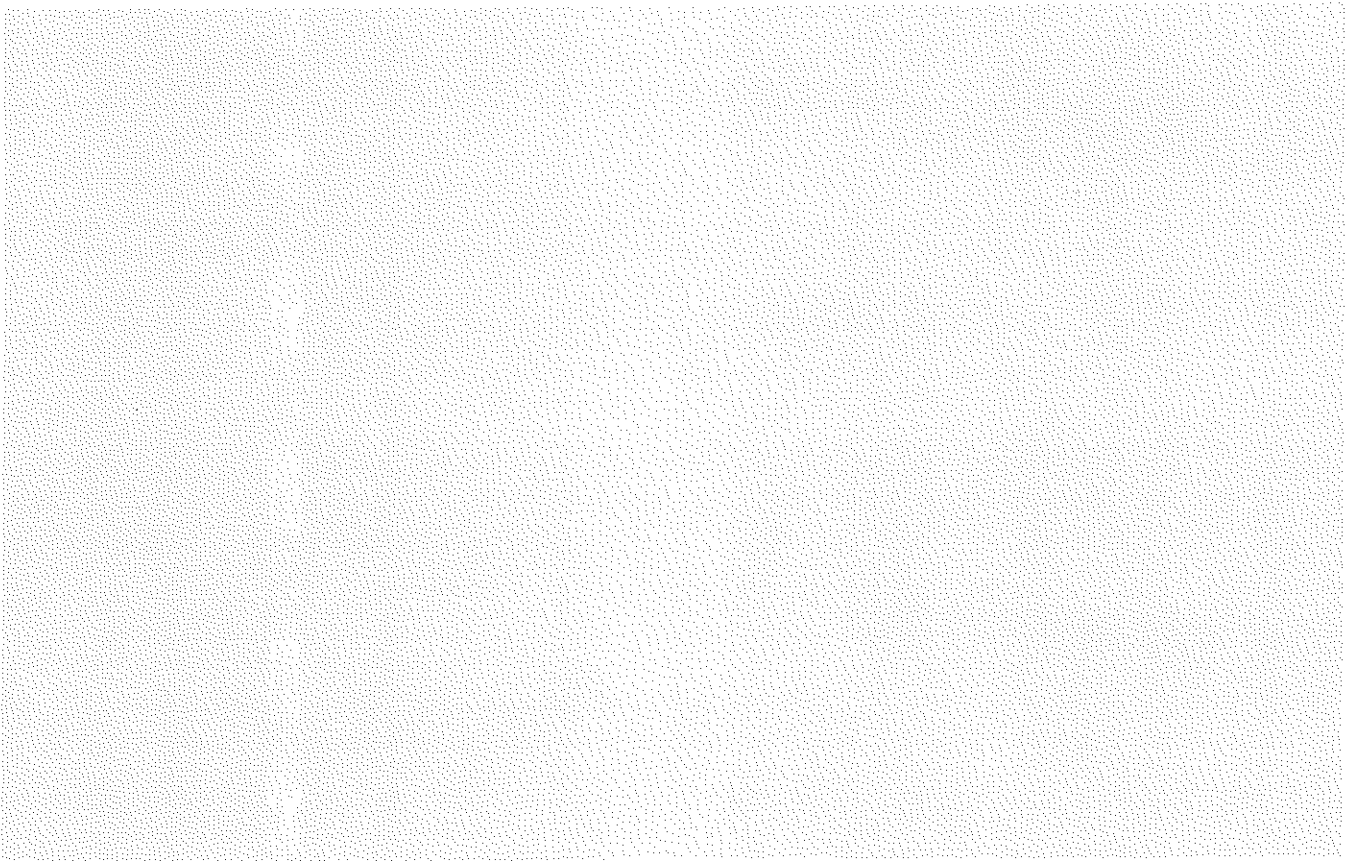
NYPDFINEST\MUIR921613 | 1/3/2024 23:12

[illegible]

Exhibit 43



45. Upon information and belief, on or about December 31, 2023, Defendant filed Complaint Report No. 2023-62-8980 claiming aggravated harassment.



FILED: KINGS COUNTY CLERK 02/23/2024 12:00 PM

INDEX NO. 505280/2024

NYSCEF DOC NO. 20

RECEIVED NYSCEF: 02/23/2024


INCIDENT INFORMATION SLIP
 PD 301-164 (Rev. 07-15)
Date: 12/31/23Welcome to 062
(Command)1925 Bath Avenue Bklyn NY
(Address)718-236-2611
(Telephone No.)We hope that your business with us was handled satisfactorily. Your particular matter has been assigned the following number 8980

Complaint Report No.:

2023-62-8980

Accident Report No.:

Aided Report No.:

Reported to:

PB
(Rank)BUCHHEIT
(Name)31720
(Shield No.)

Date of Occurrence:

12/31/23

Time:

1507

Location of Occurrence:

2586 85 St.

Crime:

Agg. Harassment

Please keep this report should you have to refer to this matter in the future. If you need any further assistance feel free to contact us at telephone number 718-236-2522. Please let us know if you have any suggestions on how we better serve you. As you may already know, we will provide you with a crime prevention survey of your residence or business. Please ask for more information on this and other crime prevention initiatives. Our goal is to make you and your property safe.

COURTESY — PROFESSIONALISM — RESPECT**REMEMBER: CALL "911" FOR EMERGENCIES ONLY!!!**

Exhibit 44



Matter of Salazar

Matter of Salazar 2021 NY Slip Op 02300 Decided on April 14, 2021 Appellate Division, Second Department Per Curiam. Published by New York State Law Reporting Bureau pursuant to Judiciary Law § 431. This opinion is uncorrected and subject to revision before publication in the Official Reports.

Decided on April 14, 2021 SUPREME COURT OF THE STATE OF NEW YORK Appellate Division, Second Judicial Department

WILLIAM F. MASTRO, A.P.J.

REINALDO E. RIVERA

CHERYL E. CHAMBERS

LEONARD B. AUSTIN

COLLEEN D. DUFFY, JJ.

2020-08200

[*1]In the Matter of Hugo G. Salazar, admitted as Hugo Gustavo Salazar, an attorney and counselor-at-law. Grievance Committee for the Second, Eleventh, and Thirteenth Judicial Districts, petitioner; Hugo G. Salazar, respondent. (Attorney Registration No. 2662476)

DISCIPLINARY PROCEEDING instituted by the Grievance Committee for the Second, Eleventh, and Thirteenth Judicial Districts. The respondent was admitted to the Bar at a term of the Appellate Division of the Supreme Court in the Second Judicial Department on April 26, 1995, under the name Hugo Gustavo Salazar.

Diana Maxfield Kearse, Brooklyn, NY (Susan Korenberg of counsel), for petitioner.

PER CURIAM.

OPINION & ORDER

On November 12, 2020, the Grievance Committee for the Second, Eleventh, and Thirteenth Judicial Districts served the respondent with a notice of petition dated November 2, 2020, and a verified petition dated October 30, 2020, and duly filed those papers with this Court together with an affidavit of service. The petition contains two charges alleging that the respondent misappropriated funds entrusted to him as a fiduciary with respect to nine matters, and failed to cooperate with the Grievance Committee's investigation of a complaint of professional misconduct, in violation of rules 1.15(a) and 8.4(h) of the Rules of Professional Conduct (22 NYCRR 1200.0), respectively. The notice of petition directed the respondent to serve and file his answer to the verified petition within 20 days after service upon him of the notice of petition and the verified petition. To date, the respondent has neither served nor filed an answer to the verified petition, as directed.

The Grievance Committee now moves to deem the charges against the respondent established based upon his default and to impose such discipline upon him as this Court deems appropriate. Although the motion papers were served upon the respondent on December 18, 2020, he has neither opposed the instant motion nor interposed any other response thereto. By separate motion, the Grievance Committee moves, inter alia, to immediately suspend the respondent from the practice of law pursuant to 22 NYCRR 1240.9(a)(1) and (3), upon a finding that he is guilty of professional misconduct immediately threatening the public interest. The respondent has not filed papers in response to this motion.

Accordingly, the Grievance Committee's motion to deem the charges in the verified petition dated October 30, 2020, established is granted, the charges in the verified petition are deemed established, and, effective immediately, the respondent is disbarred and his name is stricken from the roll of attorneys and counselors-at-law. The Grievance Committee's separate motion, inter [*2] alia, to immediately suspend the respondent from the practice of law is denied as academic.

MASTRO, A.P.J., RIVERA, CHAMBERS, AUSTIN and DUFFY, JJ., concur.

ORDERED that the Grievance Committee's motion to deem the charges in the verified petition dated October 30, 2020, established is granted, and the Grievance Committee's separate motion, inter alia, to immediately suspend the respondent, Hugo G. Salazar, admitted as Hugo Gustavo Salazar, from the practice of law is denied as academic; and it is further,

ORDERED that pursuant to Judiciary Law § 90, effective immediately, the respondent, Hugo G. Salazar, admitted as Hugo Gustavo Salazar, is disbarred, and his name is stricken from the roll of attorneys and counselors-at-law; and it is further,

ORDERED that the respondent, Hugo G. Salazar, admitted as Hugo Gustavo Salazar, shall comply with the rules governing the conduct of disbarred or suspended attorneys (see 22 NYCRR 1240.15); and it is further,

ORDERED that pursuant to Judiciary Law § 90, the respondent, Hugo G. Salazar, admitted as Hugo Gustavo Salazar, is commanded to desist and refrain from (1) practicing law in any form, either as principal or as agent, clerk, or employee of another, (2) appearing as an attorney or counselor-at-law before any court, Judge, Justice, board, commission, or other public authority, (3) giving to another an opinion as to the law or its application or any advice in relation thereto, and (4) holding himself out in any way as an attorney and counselor-at-law; and it is further,

ORDERED that if the respondent, Hugo G. Salazar, admitted as Hugo Gustavo Salazar, has been issued a secure pass by the Office of Court Administration, it shall be returned forthwith to the issuing agency, and the respondent shall certify to the same in his affidavit of compliance pursuant to 22 NYCRR 1240.15(f).

ENTER:

Aprilanne Agostino

Clerk of the Court

Some case metadata and case summaries were written with the help of AI, which can produce

Exhibit 45



Exhibit

46



New York City Comptroller
Brad Lander

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

Form Version: NYC-COMPT-BLA-PI1-E

Personal Injury Claim Form

Electronically filed claims must be filed within 90 days of the occurrence using the Office of the NYC Comptroller's website. If the claim is not resolved within one (1) year and 90 days of the occurrence, you must start a separate legal action in a court of law before the expiration of this time period to preserve your rights.

I am filing: ☒ On behalf of myself.

☐ On behalf of someone else. If on someone else's behalf, please provide the following information.

Last Name:

First Name:

Relationship to the claimant:

Claimant Information

*Last Name:

GU

*First Name:

FEIFEI

*Address:

2526 85TH ST

Address 2:

*City:

BROOKLYN

*State:

NEW YORK

*Zip Code:

11214

*Country:

USA

Date of Birth:

Format: MM/DD/YYYY

Soc. Sec. #

HICN:

(Medicare #)

Date of Death:

Format: MM/DD/YYYY

Phone:

*Email Address: FG1011@NYU.EDU

*Retype Email

Address:

FG1011@NYU.EDU

Occupation:

City Employee? ☐ Yes ☐ No ☐ NA

Gender

☐ Male ☐ Female ☐ Other

☐ Attorney is filing.

Attorney Information (If claimant is represented by attorney)

+Firm or Last Name:

+Firm or First Name:

+Address:

Address 2:

+City:

+State:

+Zip Code:

Tax ID:

Phone #:

+Email Address:

+Retype Email Address:

The time and place where the claim arose

*Date of Incident:

01/12/2024

Format: MM/DD/YYYY

Time of Incident:

Format: HH:MM AM/PM

*Location of Incident:

2526 85TH ST

Address:

Address 2:

City:

*State:

NEW YORK

Borough:

BROOKLYN (KINGS)

* Denotes required fields.

+Denotes field that is required if attorney is filing.

A Claimant OR an Attorney Email Address is required.



New York City Comptroller
Brad Lander

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

***Manner in which
claim arose:**

FALSE ARREST, ARREST WITHOUT PROBABLE CAUSE, FALSE IMPRISONMENT, MALICIOUS PROSECUTION,
BY VARIOUS NYPD OFFICERS AND ADA.



New York City Comptroller
Brad Lander

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

**The items of
damage or injuries
claimed are
(include dollar
amounts):**

PAIN AND SUFFERING
EMOTIONAL DISTRESS



New York City Comptroller
Brad Lander

Office of the New York City Comptroller
1 Centre Street
New York, NY 10007

Medical Information

1st Treatment Date: *Format: MM/DD/YYYY*

Hospital/Name:

Address:

Address 2:

City:

State:

Zip Code:

Date Treated in
Emergency Room: *Format: MM/DD/YYYY*

Was claimant taken to hospital by ☐ Yes ☐ No ☐ NA
an ambulance?

Employment Information (If claiming lost wages)

Employer's Name:

Address:

Address 2:

City:

State:

Zip Code:

Work Days Lost:

Amount Earned
Weekly:

Treating Physician Information

Last Name:

First Name:

Address:

Address 2:

City:

State:

Zip Code:

Witness 1 Information

Last Name: CHAN

First Name: YU HIN

Address: 2526 85TH ST

Address 2:

City: BROOKLYN

State: NEW YORK

Zip Code: 11214 Phone:

Witness 2 Information

Last Name:

First Name:

Address:

Address 2:

City:

State:

Zip Code: Phone:

Witness 3 Information

Last Name:

First Name:

Address:

Address 2:

City:

State:

Zip Code: Phone:

Witness 4 Information

Last Name:

First Name:

Address:

Address 2:

City:

State:

Zip Code: Phone:

New York City Comptroller
Brad Lander**Complete if claim involves a NYC vehicle****Owner of vehicle claimant was traveling in**

Last Name:
First Name:
Address
Address 2:
City:
State:
Zip Code:

Non-City vehicle driver

Last Name:
First Name:
Address
Address 2:
City:
State:
Zip Code:

Information

Non-City vehicle information

Make, Model, Year
of Vehicle:
Plate #:
VIN #:

City vehicle information

Plate #:

--

City Driver Last
Name:
City Driver First
Name:

Option of
claimant:

- ☐ Driver ☐ Passenger
☐ Pedestrian ☐ Bicyclist
☐ Motorcyclist ☐ Other

Total Amount
Claimed:

\$100,000,000.00

Format: Do not include "\$" or ",".

The **Total Amount Claimed** can only be entered once the following
required fields are entered:

Claimant Last Name
 Claimant First Name
 Claimant Address, City, State, Zip Code, and Country
 Claimant Email or Attorney Email
 Date of Incident
 Location of Incident (Including State)
 Manner in which claim arose

If attorney is filing, the following fields are also required:
 Attorney Last Name, First Name, Address, City, State, Zip Code, Email

I certify that all information contained in this notice is true and correct to the best of my knowledge and belief. I understand that the making of any false statement of material fact herein will subject me to criminal penalties and civil liabilities.